

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

ASHLEY SAVAGE, DAVID LEIDLEIN, RONALD COHEN, AND JAMES SHERBURNE *individually and as representatives of similarly situated persons, and on behalf of the Plan,*

*Plaintiffs,*

v.

SUTHERLAND GLOBAL SERVICES, INC., CVAGS, LLC d/b/a CLEARVIEW GROUP, SHILPA KONDA, DIANE MOHORTER, LORI D'AMBROSIO, KATHLEEN DECANN, AND JOHN DOES 1-20,

*Defendants.*

Civil Action No.

19-cv-06840-EAW

PLAINTIFFS' RESPONSE TO SUTHERLAND GLOBAL SERVICES, INC.'S  
MOTION TO SEAL

Plaintiffs write in response to Defendant Sutherland Global Services Inc.'s ("Sutherland") Motion to Seal. *See* Dkt. No. 124. Although it is plaintiffs' position that the documents attached to the Declaration of Kevin J. Mulvehill executed December 18, 2023 ("Mulvehill Decl.") as Exhibits 1, 4, 5, 6, and 7 (*see* Dkt. No. 124-1), that serve as part of the basis for Sutherland's Motion to Seal were improperly designated as Confidential or Confidential—Counsel and Experts Only Material, the designations remain. Accordingly, plaintiffs do not oppose Sutherland's Motion to Seal to the extent that plaintiffs agree that the above referenced documents remain designated as Confidential Confidential—Counsel or Experts Only Material until such time as Sutherland removes the designations or the Court rules that the designations are improper.

Dated: January 30, 2024

**THOMAS & SOLOMON PLLC**

By: /s/ Adam T. Sanderson  
J. Nelson Thomas, Esq.  
Adam T. Sanderson, Esq.  
*Attorneys for Plaintiffs*  
693 East Avenue  
Rochester, New York 14607  
Telephone: (585) 272-0540  
nthomas@theemploymentattorneys.com  
asanderson@theemploymentattorneys.com